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Attorneys for Plaintiffs TS Production LLC and TS Merchandising Ltd.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands corporation, and TS Production LLC, a Hungarian limited liability company.

Case No. 07 C 6518

**AGREED UPON MOTION TO
EXTEND TIME TO RESPOND TO
COMPLAINT AND TO VACATE
JANUARY 16, 2008 INITIAL STATUS
HEARING**

(Assigned to the Hon. Ronald A. Guzman)

Dan and Loretta Hollings, Arizona residents, and Web Services, LLC, an Arizona limited liability company,

Defendants.

The parties, by and through undersigned counsel, hereby request that Defendants shall have through and until February 6, 2008, to answer, object or otherwise respond to Plaintiffs' Complaint. This brief extension is requested to allow Defendants' new counsel, who were

1 retained last week, an opportunity to prepare a response. Defendants reserve all rights and
2 defenses available pursuant to Rule 12 of the Federal Rules of Civil Procedure.

3 The parties also hereby request that the court vacate the initial status hearing currently
4 scheduled for January 16, 2008, at 9:30 a.m. and reschedule the hearing to a date after the
5 deadline for responding to the complaint. The parties request that the court reschedule the
6 hearing so that counsel may have an opportunity to confer and jointly prepare an initial status
7 report to the court.

8 A proposed Order will be submitted to the court in accordance with its Case Management
9 Procedures.

10 RESPECTFULLY SUBMITTED this 7th day of January 2008.

11
12 /s/ Christopher I. Cedillo
13 Brian A. Cabianca
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27 /s/ Jessica B. Couch (with permission)
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Attorneys for Defendants

1 I hereby certify that on January 7, 2008, I electronically transmitted the attached document to the
2 Clerk's office using the ECF System for filing and transmittal of a Notice of Electronic Filing to
the following ECF registrants:

3 Lisa C. Thompson
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14 Attorneys for Defendants Dan and Loretta Hollings and Web Services, LLC

15 COPY of the foregoing and Notice of Electronic Filing
16 hand-delivered on the 8th day of January 2008, to:

17 Honorable Ronald A. Guzman
18 United States District Court
19 Everett McKinley Dirksen Building
219 S. Dearborn Street, Room 1278
Chicago, IL 60604

21 By: s/ Betty Rios